

## **EXHIBIT I**

**From:** [Tedra Cannella](#)  
**To:** [Hill, Rick](#)  
**Cc:** [Ferguson, Lindsay Gatling](#); [Murray, Claire C.](#); [Chausmer, Aaron](#); [Greenslit, Kristin](#); [Deubel, Emily G.](#); [Lerch, Connie W.](#); [Smith, LaDonna D.](#); [Flynn, Monica P.](#); [Robert Snyder](#); [Hannah Drosky Amanuel](#); [Devin Mashman](#); [Cathy Huff](#)  
**Subject:** Bryson v. Rough Country: expert deadlines  
**Date:** Tuesday, March 26, 2024 10:48:43 AM  
**Attachments:** [image001.png](#)

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Mr. Hill,

To confirm our discussion from a moment ago, Plaintiffs disagree that Mr. Lewis's supplemental report alters anything about this case or warrants an extension on Rough Country's expert disclosures. In an effort to avoid a dispute however, we will agree to allow Rough Country's experts to file supplemental reports on OSIs up to the date of their deposition without any objection. That will allow them additional time to further review the other similar incidents. The deadline for expert depositions is 5/15—two months after Mr. Lewis's deposition. That should be plenty of time for them to address the supplemental report, which contains only information that Rough Country has known for over a decade. We have asked for dates for those depositions four times now, going back to February 6. If Rough Country will send us the dates, then we can try to backload them during the time period to allow Rough Country to maximize that time.

Rough Country contends it might want to disclose additional experts to address discussions of Bacho and Mendoza as a result of Mr. Lewis's report. That's a contingency that has not arisen. The best solution in our view is to address that question if it arises. Hopefully, we can agree to a solution at the time, but if not, then Rough Country can explain to the Court any prejudice it contends it has suffered as a result of the supplemental report.

Regardless, the Court's order requiring disclosure of experts by Friday is still in effect. Rough Country certainly knows who its experts are and has reports ready on everything but OSI opinions. We do not agree to further delay that deadline.

Thank you.

CANNELLA

SNYDER

**Tedra L. Cannella**  
 Partner

**Phone:** 404.800.4828

**Email:**  
[tedra@cannellasnyder.com](mailto:tedra@cannellasnyder.com)

315 W. Ponce de Leon Ave.  
 Suite 885  
 Decatur, GA 30030

[www.cannellasnyder.com](http://www.cannellasnyder.com)